



State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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July 12, 1999

Mark Novak
Division of Water Quality
P. O. Box 144870
Salt Lake City, Utah 84114-4870

Re: Comments on Renewal of Ground Water Discharge Permit No. UGW350001, Kennecott Utah Copper Corporation (KUCC), Barneys Canyon Mine, M/035/009, Salt Lake County, Utah

Dear Mr. Novak:

The Utah Mined Land Reclamation Act (Act) provides the Minerals Regulatory Program of the Division of Oil, Gas and Mining with regulatory jurisdiction over the operation and reclamation of mineral mining in the state of Utah. The terms and conditions of the ground water discharge permit renewal could have an effect on the reclamation plan for the Barneys Canyon mining operations currently approved by the Minerals Regulatory Program of the Division. For this reason, the Division offers the following comments on the proposed renewal of the groundwater permit:

Part I. Specific Permit Conditions, Section G. Closure Requirements, item 2. - describes the contents of a closure document to be submitted for review and approval six months prior to the end of the operational term of the heap leach pads, ponds, or reclamation of any sulfide waste rock piles. The first item to be included in this closure document is described under Item 2. (a) of this sections as being the need for justification for the type of cover or cap placed over the leach pads and waste rock piles to prevent ground water pollution. In as much as the cover or cap will affect final reclamation of these features the Division would request the opportunity to review this justification before the Division of Water Quality (DWQ) accepts or approves of the closure document.

Section I. Compliance Schedule, 1. Stockpiled Sulfide Ore - discusses the submission of a revised Waste Rock Management Plan within 90 days of the permit renewal. The Division is presently aware of the Waste Rock Management Plan submitted by KUCC as part of the Barneys Canyon permit approved by the Division of Water Quality on September 23, 1994. The Division requests the opportunity to review and comment on this revised Waste Rock Management Plan before DWQ accepts or approves it. The Division will need to incorporate this plan into the currently approved reclamation plan.

Section III. Permit Conditions, F. Compliance Schedule - describes the temporary storage of sulfide ore which was permitted under the conditions which are no longer appropriate. This section

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mentions that the permittee has developed new plans for managing the sulfide ore stockpiles which reflect changes in the permit. The Division requests the opportunity to review and comment on these new plans for managing the sulfide ore stockpiles before DWQ accepts or approves it.

Thank you for this opportunity to comment on this permit renewal. If you have any questions regarding this letter you may contact me, Tony Gallegos or Doug Jensen by phone at (801) 538-5286, 538-5267 and 538-5382, respectively.

Sincerely,

A handwritten signature in cursive script, reading "D. Wayne Hedberg". The signature is written in dark ink and is positioned above the printed name and title.

D. Wayne Hedberg
Permit Supervisor
Minerals Regulatory Program

vb
cc: Dennis Kerstiens, Barneys Canyon Mine
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